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November 11, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Solid 21, Inc. v. Richemont North America, Inc. et al.*, No. 1:19-cv-01262-LGS

Dear Judge Schofield,

This firm is counsel to Defendants Richemont North America, Inc., Richemont International S.A., and Montblanc-Simplo GmbH (collectively, “Defendants”) in the above-captioned case. We write in response to Plaintiff’s request to withdraw (ECF No. 211) and the Court’s November 10, 2022 Order setting a November 16, 2022 telephonic conference to address same. (ECF No. 212.)

On the same day as the conference, November 16, 2022, the parties face deadlines to submit joint requests to charge, joint *voir dire*, joint verdict form, and any memorandum of law, and on November 30, 2022, the parties must file the final pretrial order. (ECF No. 160.) Given the communication breakdown between Plaintiff’s counsel and his client, the parties cannot meet those deadlines. In addition, given that the Court has ordered full briefing on Defendants’ motion to strike Plaintiff’s jury demand, we request that the Court adjourn these deadlines until that issue is decided, as many of the submissions may not be required.

We have spoken with counsel for Plaintiff about this request, and while they cannot consent to this extension because they are not authorized to do so at this time, they agreed that it makes sense under the current circumstances.

Finally, we wish to respond to one aspect of Plaintiff’s counsel’s request to withdraw. While we have no issue with a 60-day continuance of interim deadlines, especially given the jury issue, the Court has already pushed the trial date to March 6, 2023, based on Plaintiff’s counsel’s competing trial. (ECF Nos. 162, 165.) We are hopeful that even with replacement counsel, the current trial date remains. Our client would very much like to move this case to closure and avoid further delays. Of course, we defer to the Court, but our client asked us to express its strong preference that the trial date remain as scheduled.

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Respectfully submitted,

/s/ John P. Margiotta

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cc: All counsel of record (via ECF)